

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

JENNIFER HASEMANN  
and DEBBIE HOTH, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

GERBER PRODUCTS CO.,

Defendant.

Case No. 1:15-cv-02995-MKB-RER

JEREMY GREENE  
and CETARIAWILKERSON, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

GERBER PRODUCTS CO.,

Defendant.

Case No. 1:16-cv-1153-MKB-RER

**PLAINTIFFS' NOTICE OF MOTION FOR APPOINTMENT OF  
INTERIM CO-LEAD COUNSEL PURSUANT TO  
FEDERAL CIVIL PROCEDURE RULE 23(g)**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of the Motion to Appoint Michael R. Reese of Reese LLP; E. Michelle Drake of Berger & Montague, P.C.; Brett Cebulash of Taus, Cebulash & Landau, LLP; and, John Yanchunis of Morgan & Morgan Complex Litigation Group as Interim Co-Lead Class Counsel, Plaintiffs Jennifer Hasemann, Debbie Hoth, Jeremy Greene and Cetaria Wilkerson (together, “Plaintiffs”), through their undersigned counsel, will and hereby do move this Court before the Honorable Margo K. Brodie of the Eastern District of New York, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order appointing Michael R. Reese of Reese LLP; E. Michelle Drake of Berger & Montague, P.C.; Brett Cebulash of Taus, Cebulash & Landau, LLP; and, John Yanchunis of Morgan & Morgan Complex Litigation Group, as interim co-lead counsel for a proposed nationwide class (not including California and Washington, D.C.) and for such further relief as this Court deems just and proper (the “Motion”).

Plaintiffs make this Motion pursuant to Rule 23(g)(3) of the Federal Rules of Civil Procedure and on the grounds that appointment of interim co-lead class counsel is appropriate at this time to “fairly and adequately represent the interests of the class” and because Michael R. Reese of Reese LLP; E. Michelle Drake of Berger & Montague, P.C.; Brett Cebulash of Taus, Cebulash & Landau, LLP; and, John Yanchunis of Morgan & Morgan Complex Litigation Group, will best represent the interests of the proposed nationwide class (not including California or Washington, D.C.). This Motion is based upon this notice of motion, the accompanying memorandum of law, all pleadings on file, and any additional briefing and argument presented to the Court before or at the hearing on this Motion.

Date: May 16, 2016

Respectfully submitted,

**REESE LLP**

By: /s/ Michael R. Reese

Michael R. Reese  
George V. Granade  
100 West 93rd Street, 16th Floor  
New York, New York 10025  
Telephone: (212) 643-0500  
Facsimile: (212) 253-4272  
Email: *mreese@reesellp.com*  
*ggranade@reesellp.com*

**TAUS, CEBULASH & LANDAU, LLP**

Brett Cebulash  
Kevin Landau  
Miles Greaves  
80 Maiden Lane, Suite 1204  
New York, New York 10038  
Telephone: (212) 931-0704  
Facsimile: (212) 931-0703  
Email: *bcebulash@tcclaw.com*  
*klandau@tcclaw.com*  
*mgreaves@tcclaw.com*

**BERGER & MONTAGUE, P.C.**

E. Michelle Drake  
43 SE Main Street - Suite 505  
Minneapolis, Minnesota 55414  
Telephone: (612) 594.5933  
Email: *emdrake@bm.net*

**MORGAN & MORGAN COMPLEX  
LITIGATION GROUP**

John A. Yanchunis  
201 N. Franklin Street, 7th Floor  
Tampa, Florida 33602  
Telephone: (813)275-5275  
Facsimile: (813) 222-4736  
Email: *jyanchunis@forthepeople.com*

**BERGER & MONTAGUE, P.C.**

Shanon J. Carson

Sarah R. Schalman-Bergen

1622 Locust Street

Philadelphia, Pennsylvania 19103

Telephone: (215) 875-4656

Facsimile: (215) 875-4604

Email: *scarson@bm.net*

*sschalman-bergen@bm.net*

*Attorneys for Plaintiffs and the Proposed Class*